

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
TOMAS RAMON	:	VIOATIONS: 21 U.S.C. § 846
a/k/a "Luis Cruz"	:	(Conspiracy to
DIGNO RAFAEL SOSA ADAMES	:	distribute heroin -
a/k/a "Felix Rodriguez"	:	1 count)
	:	21 U.S.C. § 841(a)(1)
	:	(Distribution of heroin - 1 Count)
	:	21 U.S.C. § 841(a)(1)
	:	(Possession with intent to
	:	distribute heroin -
	:	1 Count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about April 30, 2003 to on or about May 1, 2003, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

TOMAS RAMON,  
a/k/a "Luis Cruz,"  
DIGNO RAFAEL SOSA ADAMES,  
a/k/a "Felix Rodriguez,"

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly and intentionally distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United

States Code, Sections 841(a)(1) and 841(b)(1)(B).

### MANNER AND MEANS

2. It was part of the conspiracy that defendants TOMAS RAMON and DIGNO RAFAEL SOSA ADAMES and other persons known and unknown to the grand jury obtained heroin from unknown sources of supply, and agreed to package the heroin into bundles consisting of 13 packets of heroin per bundle and sell and deliver the heroin to a cooperating witness, for sale and distribution on the street.

It was a further part of the conspiracy that:

3. Defendants TOMAS RAMON and DIGNO RAFAEL SOSA ADAMES agreed to prepare 300 bundles of heroin stamped with a brand name of "Super Mario," and sell and deliver the packaged heroin to a cooperating witness in return for an agreed price of \$19,500.

4. Defendants TOMAS RAMON and DIGNO RAFAEL SOSA ADAMES prepared and packaged 300 bundles of heroin stamped with the brand name "Super Mario," and transported the heroin bundles to 722 Earp Street, Philadelphia, Pennsylvania to deliver the packaged heroin and to collect \$19,500 in payment from a cooperating witness.

### OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania:

1. On or about April 30, 2003, defendant DIGNO RAFAEL SOSA ADAMES delivered a sample of "Super Mario" brand heroin, consisting of 4 packets of heroin to a cooperating witness at 722 Earp Street, Philadelphia, Pennsylvania.

2. On or about April 30, 2003, defendant TOMAS RAMON spoke to the

cooperating witness by telephone and advised the cooperating witness that he would have the package (300 bundles) of heroin ready for delivery to the cooperating witness by 11:00 a.m. on May 1, 2003.

3. On or about May 1, 2003, defendant TOMAS RAMON spoke to the cooperating witness by telephone and, after the cooperating witness advised RAMON that he would be unable to meet RAMON and defendant DIGNO RAFAEL SOSA ADAMES that day, but stated that he had left \$19,500 with a nephew at 722 Earp Street to pay for 300 bundles of "Super Mario" heroin to be delivered. RAMON advised the cooperating witness that he would personally make the delivery of the heroin to 722 Earp Street, Philadelphia, Pennsylvania.

4. On or about May 1, 2003, defendants TOMAS RAMON and DIGNO RAFAEL SOSA ADAMES walked to 722 Earp Street, Philadelphia, Pennsylvania, carrying a plastic bag containing 345 bundles of heroin, 300 of which were stamped "Super Mario," knocked on the door of the residence, and when there was no answer, placed the plastic bag containing the heroin near some trash at the curb outside the 722 Earp Street residence and waited across the street.

5. On or about May 1, 2003, defendant TOMAS RAMON while waiting outside 722 Earp Street, Philadelphia, Pennsylvania, to complete the delivery of the bundles of heroin and receive payment, placed a telephone call on a cell phone to the cell phone of the cooperating witness.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2003, at Philadelphia, in the Eastern District of  
Pennsylvania, defendants

TOMAS RAMON,  
a/k/a "Luis Cruz,"  
DIGNO RAFAEL SOSA ADAMES,  
a/k/a "Feliz Rodriguez,"

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or  
substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and  
Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 1, 2003, at Philadelphia, in the Eastern District of  
Pennsylvania, defendants

TOMAS RAMON,  
a/k/a "Luis Cruz,"  
DIGNO RAFAEL SOSA ADAMES,  
a/k/a "Feliz Rodriguez,"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, more than 100 grams, that is, approximately 145 grams, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and  
Title 18, United States Code, Section 2.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
United States Attorney